

Charles V. Baker  
Draper, Inc.  
411 South Pearl Street  
Spiceland, IN 47385

Re: 065-11865-00029  
First Significant Permit Revision to  
**FESOP No.: F065-7956-00029**

Dear Mr. Baker:

Draper, Inc. was issued a FESOP permit on September 25, 1997 for operation of a stationary window shade and projection screen light assembly and surface coating operation. A letter requesting changes to this permit was received on February 8, 2000. Pursuant to the provisions of 326 IAC 2-8-11.1 a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the construction and operation of three (3) paint spray booths and two (2) natural gas combustion units.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions  
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Prior to start of operation, the following requirements should be met:
- (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
  - (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
  - (c) Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nishat Hydari, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call 973-575-2555 (ext. 3216) or 1-800-451-6027 press 0 and ask for extension 3-6878.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments

NH/EVP

cc: File - Henry County  
U.S. EPA, Region V  
Henry County Health Department  
Air Compliance Section Inspector - Warren Greiling  
Compliance Data Section - Jerri Curless  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michelle Boner

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
and ENHANCED NEW SOURCE REVIEW  
OFFICE OF AIR MANAGEMENT**

**Draper, Inc.  
411 South Pearl Street  
Spiceland, Indiana 47385**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F065-7956-00029	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: September 25, 1997
First Significant Permit Revision: FSPR065-11865-00029	Pages Affected: 3, 3a, 4, 4a, 24, 24a, 26a, 26b, 26c, 29a, 30
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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- D.2.6 Particulate Matter (PM)
- D.2.7 Monitoring

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary window shade and projection screen light assembly and surface coating operation.

Responsible Official: Michael D. Broome  
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385  
Mailing Address: 411 South Pearl Street, Spiceland, Indiana 47385  
SIC Code: 2591, 3861  
County Location: Henry  
County Status: Attainment for all criteria pollutants  
Source Status: Federally Enforceable State Operating Permit (FESOP)  
Minor Source, under PSD or Emission Offset Rules;  
Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

- (1) one (1) paint spray booth, identified as EU2, utilizing an air atomization spray application system, coating a maximum of 6 wood cases, 3 metal light bloc frames, or 60 plastic projection screens per hour, using dry filters for particulate matter overspray control, and exhausting at one (1) stack, identified as S1;
- (2) one (1) paint spray booth, identified as EU4, utilizing an air atomization spray application system, coating a maximum of 60 plastic projection screens per hour, using dry filters for particulate matter overspray control, and exhausting at one (1) stack, identified as S2;
- (3) One (1) paint spray booth, identified as EU8, utilizing an air atomization spray application system, coating a maximum of 60 rigid projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S4;
- (4) One (1) paint spray booth, identified as EU10, utilizing an air atomization spray application system, coating a maximum of 10 flexible projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S5; and
- (5) One (1) paint spray booth, identified as EU12, utilizing an air atomization spray application system, coating a maximum of 6 wood cases per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S6.

### A.3 Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(I)]

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This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) two (2) natural gas fired make-up air units, identified as EU1 and EU3, each rated at 1.0 and 0.8 million (MM) British thermal units (Btu) per hour, respectively;
- (2) forty one (41) natural gas fired space heaters, with a combined heat input capacity of 0.2

MMBtu per hour;

- (3) Two (2) natural gas fired air rotation units, identified as 91 and 92, each rated at 3.125 million (MM) British thermal units (Btu) per hour.

A.4 FESOP Applicability [326 IAC 2-8-2]

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (1) one (1) paint spray booth, identified as EU2, utilizing an air atomization spray application system, coating a maximum of 6 wood cases, 3 metal light bloc frames, or 60 plastic projection screens per hour, using dry filters for particulate matter overspray control, and exhausting at one (1) stack, identified as S1; and
- (2) one (1) paint spray booth, identified as EU4, utilizing an air atomization spray application system, coating a maximum of 60 plastic projection screens per hour, using dry filters for particulate matter overspray control, and exhausting at one (1) stack, identified as S2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The usage of VOC delivered to the applicators, including clean up solvents, in the two (2) paint spray booths (EU2 and EU4) shall be limited to less than 25 tons per 12 consecutive month period, rolled on a monthly basis. Therefore, the Best Available Control Technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

#### D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)]

The usage of a single HAP and total HAPs delivered to the applicators, including clean up solvents, in the two (2) paint spray booths (EU2 and EU4) and the three (3) paint spray booths (EU8, EU10 and EU12) listed in Section D.2, shall be limited to less than 10 and 25 tons per 12 consecutive month period, rolled on a monthly basis, respectively. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.

#### D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the two (2) paint spray booths (EU2 and EU4) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the two (2) paint spray booths (EU2 and EU4) and their control devices.

### Compliance Determination Requirements

#### D.1.5 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-4.

#### D.1.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the two (2) paint booths (EU2



and EU4) are in operation.

## SECTION D.2

## FACILITY CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) paint spray booth, identified as EU8, utilizing an air atomization spray application system, coating a maximum of 60 rigid projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S4;
- (b) One (1) paint spray booth, identified as EU10, utilizing an air atomization spray application system, coating a maximum of 10 flexible projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S5; and
- (c) One (1) paint spray booth, identified as EU12, utilizing an air atomization spray application system, coating a maximum of 6 wood cases per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The usage of VOC delivered to the applicators, including clean up solvents, in the three (3) paint spray booths (EU8, EU10 and EU12) shall be limited to less than 25 tons per 12 consecutive month period, rolled on a monthly basis. Therefore, the Best Available Control Technology (BACT) requirements in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

#### D.2.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)]

The usage of a single HAP and total HAPs delivered to the applicators, including clean up solvents, in the three (3) paint spray booths (EU8, EU10 and EU12) and the two (2) paint spray booths (EU2 and EU4) listed in Section D.1, shall be limited to less than 10 and 25 tons per 12 consecutive month period, rolled on a monthly basis, respectively. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.

#### D.2.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), particulate matter (PM) from the three (3) paint spray booths (EU8, EU10 and EU12) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

#### D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the three (3) paint spray booths and their control device.

## Compliance Determination Requirements

**D.2.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]**

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The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**D.2.6 Particulate Matter (PM)**

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The dry filters for PM control shall be in operation at all times when the three (3) paint spray booths (EU8, EU10 and EU12) are in operation.

**D.2.7 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S4, S5, S6) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.2.8 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.2.1 and D.2.2 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1 and D.2.2.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;

- (4) The total VOC usage for each month; and
- (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Draper, Inc.  
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385  
Mailing Address: 411 South Pearl Street, Spiceland, Indiana 47385  
FESOP No.: FSPR065-11865-00029  
Facility: three (3) paint spray booths (EU8, EU10 and EU12)  
Parameter: VOC  
Limit: The total usage of VOC delivered to the applicators, including clean up solvents, shall be limited to less than 25 tons per 12 consecutive month period.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Draper, Inc.  
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385  
Mailing Address: 411 South Pearl Street, Spiceland, Indiana 47385  
FESOP No.: FSPR065-11865-00029  
Facility: five (5) paint spray booths (EU2, EU4, EU8, EU10 and EU12)  
Parameter: worst case single HAP usage and total HAP usage  
Limit: The total combined usage of the worst case single HAP and total HAPs delivered to the applicators, including clean up solvents, shall be limited to less than 10 and 25 tons per 12 consecutive month period, respectively.

YEAR: \_\_\_\_\_

Month	Column 1a	Column 1b	Column 1c	Column 2a	Column 2b	Column 2c	Column 1a + 2a	Column 1b + 2b	Column 1c + 2c
	VOC Usage This Month	Single HAP Usage This Month	Total HAP Usage This Month	VOC Usage Previous 11 months	Single HAP Usage Previous 11 months	Total HAP Usage Previous 11 Months	VOC Usage 12 Month Total	Single HAP Usage 12 Month Total	Total HAP Usage 12 Month Total
Month 1									
Month 2									
Month 3									

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

**Source Name:** Draper, Inc.  
**Source Location:** 411 South Pearl Street, Spiceland, Indiana 47385  
**SIC Code:** 2591, 3861  
**County:** Henry  
**Operation Permit No.:** FSPR 065-11865-00029  
**Permit Reviewer:** Nishat Hydari/EVP

On April 3, 2000, the Office of Air Management (OAM) had a notice published in the Courier Times, New Castle, Indiana, stating that Draper, Inc. had applied for a Significant Permit Revision to its Federally Enforceable State Operating Permit (FESOP) for the addition of three (3) paint spray booths and two (2) combustion units to its stationary window shade and projection screen light assembly and surface coating operation. The notice also stated that OAM proposed to issue a FESOP Significant Permit Revision for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

No comments were received from Draper, Inc.

Upon further review, the OAM has decided to make the following revisions to the permit:

1. In the proposed Record Keeping and Reporting Requirements of D.2.8, paragraph (a), it states "To document compliance with Conditions D.2.4 and D.2.5..." It should refer back to D.2.1 and D.2.2. Same thing later in the paragraph. Also, paragraph (b) refers to Condition D.2.12, but it should refer back to D.2.7.

#### D.2.8 Record Keeping Requirements

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- (a) To document compliance with Conditions ~~D.2.4, D.2.5~~ **D.2.1 and D.2.2** the Permittee shall maintain records in accordance with (1) through (65) below. Records maintained for (1) through (65) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions ~~D.2.41~~ and ~~D.2.52~~.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;

- (3) The cleanup solvent usage for each month;
    - (4) The total VOC usage for each month; and
    - (5) The weight of VOCs emitted for each compliance period.
  - (b) To document compliance with Condition D.2.427, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.
  - (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
2. Upon further review, it was noted that D.2.9 (Reporting Requirements) too had referenced the wrong conditions. The following changes have been made to Condition D.2.9 of the permit to correct this error.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.41 and D.2.52 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.



## **Indiana Department of Environmental Management Office of Air Management**

### **Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)**

#### **Source Background and Description**

<b>Source Name:</b>	Draper, Inc.
<b>Source Location:</b>	411 South Pearl Street, Spiceland, IN 47385
<b>County:</b>	Henry
<b>SIC Code:</b>	2591, 3861
<b>Operation Permit No.:</b>	F065-7956-00029
<b>Operation Permit Issuance Date:</b>	September 25, 1997
<b>Significant Permit Revision No.:</b>	FSPR 065-11865-00029
<b>Permit Reviewer:</b>	Nishat Hydari / EVP

The Office of Air Management (OAM) has reviewed a significant permit revision application from Draper, Inc. relating to the operation of a stationary window shade and projection screen light assembly and surface coating operation.

#### **History**

On February 8, 2000, Draper, Inc. submitted an application to the OAM requesting significant revisions to their existing FESOP which was issued on September 25, 1997. The revisions include the addition of three (3) paint spray booths and two (2) combustion units.

#### **New Emission Units and Pollution Control Equipment Receiving Prior Approval**

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

- (a) One (1) paint spray booth, identified as EU8, utilizing an air atomization spray application system, coating a maximum of 60 rigid projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S4;
- (b) One (1) paint spray booth, identified as EU10, utilizing an air atomization spray application system, coating a maximum of 10 flexible projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S5; and
- (c) One (1) paint spray booth, identified as EU12, utilizing an air atomization spray application system, coating a maximum of 6 wood cases per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S6.

### Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Two (2) natural gas fired air rotation units, identified as 91 and 92, each rated at 3.125 million (MM) British thermal units (Btu) per hour.

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) F065-7956-00029, issued on September 25, 1997.

All conditions from previous approvals were incorporated into this FESOP.

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S4	EU8	40	2.5	10,000	70
S5	EU10	40	2	8,000	70
S6	EU12	31.5	2	8,000	70

### Recommendation

The staff recommends to the Commissioner that the Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on February 8, 2000.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 4.)

### Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	10.23
PM-10	10.39
SO <sub>2</sub>	0.02
VOC	77.96
CO	2.30
NO <sub>x</sub>	2.74

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Xylene	17.00
Toluene	20.46
Ethylbenzene	1.09
Methanol	0.22
Methyl Ethyl Ketone	1.96
Methyl Isobutyl Ketone	7.92
Bis (2-ethylhexyl) Pthalate	2.11
TOTAL	50.77

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Justification for Modification

The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is greater than 25 tons per year. Therefore, the FESOP source is being modified through a FESOP Significant Permit Revision. This modification is being performed pursuant to 326 IAC 2.8-11.1(f).

### Actual Emissions

No previous emission data has been received from the source.

### County Attainment Status

The source is located in Henry County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Henry County has been designated as attainment or unclassifiable for ozone.

#### Limited Potential to Emit of Modification after Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this FESOP Significant Permit Revision.

	Limited Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Single HAP	HAPs
Insignificant Activities (91 and 92)	0.05	0.21	0.02	0.15	2.30	2.74	0.00	0.00
Paint spray booths (EU8, EU10 and EU12)	0.06	0.06	0.00	24.00	0.00	0.00	6.31	15.66
Total Emissions	0.11	0.27	0.02	24.15	2.30	2.74	6.31	15.66

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

#### Limited Potential to Emit of Entire Source

	Limited Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Single HAP	HAPs
Existing emissions units (EU2, EU4 and insignificant activities)	2.17	2.17	0.00	16.09	0.00	0.00	9.40	16.43
New emission units (EU8, EU10, EU12 and insignificant activities)	0.11	0.27	0.02	24.15	2.30	2.74	6.31	15.66
Total Emissions	2.27	2.37	0.02	40.24	2.30	2.74	9.40	16.43

The potential to emit VOC of this source (which includes existing and new emission units) is less than 100 tons per year. Therefore, this source will still maintain its FESOP status.

#### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.

#### **State Rule Applicability - Entire Source**

##### **326 IAC 2-6 (Emission Reporting)**

This source is not subject to 326 IAC 2-6 (Emission Reporting), which would require the source to submit an annual emission statement. Pursuant to this rule, any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is enforceable. This source has accepted federally enforceable conditions which limit emissions of volatile organic compounds to below 100 tons per year. Therefore the requirements of 326 IAC 2-6 do not apply.

##### **326 IAC 5-1 (Visible Emissions Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### **State Rule Applicability - Individual Facilities**

##### **326 IAC 6-3-2 (Process Operations)**

The particulate matter (PM) from the three (3) paint booths (EU8, EU10 and EU12) shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times the three (3) paint booths (EU8, EU10 and EU12) are in operation, in order to comply with this limit.

##### **326 IAC 8-1-6 (General Reduction Requirements)**

Pursuant to 326 IAC 8-1-6, new facilities located anywhere in the state that were constructed on or after January 1, 1980, which have a potential to emit (PTE) VOC at 25 tons or more per year, and which are not otherwise regulated by another provision of Article 8, are subject to the rule requirements. The three (3) paint spray booths (EU8, EU10 and EU12) have a potential to emit VOC above 25 tons per year. The VOC emissions from the three (3) paint spray booths (EU8, EU10 and EU12) shall be limited to less than 25 tons per twelve (12) consecutive month period. Therefore the Best Available Control Technology (BACT) requirements under 326 IAC 8-1-6 (General Reduction Requirements) are not applicable to the three (3) paint spray booths.

##### **326 IAC 8-11 (Wood Furniture Coatings)**

This modification is not subject to the requirements of 326 IAC 8-11 because the paint spray

booth (EU12) coating wood cases is not located in Lake, Porter, Clark, or Floyd Counties.

## Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The three (3) spray paint booths have applicable compliance monitoring conditions as specified below:
  - (a) Daily visible emissions notations of the three (3) paint spray booths stacks (S4, S5 and S6) shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

These monitoring conditions are necessary because the baghouse for the melting process must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

## Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations (Appendix A, page 3).

## Changes Proposed

Bolded language has been added, the language with a line through it has been deleted:

The emission unit description in Section A.2 has been revised to include the three (3) paint spray booths.

**A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]**

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This stationary source consists of the following emission units and pollution control devices:

- (1) one (1) paint spray booth, identified as EU2, utilizing an air atomization spray application system, coating a maximum of 6 wood cases, 3 metal light bloc frames, or 60 plastic projection screens per hour, using dry filters for particulate matter overspray control, and exhausting at one (1) stack, identified as S1; ~~and~~
- (2) one (1) paint spray booth, identified as EU4, utilizing an air atomization spray application system, coating a maximum of 60 plastic projection screens per hour, using dry filters for particulate matter overspray control, and exhausting at one (1) stack, identified as S2-;
- (3) **One (1) paint spray booth, identified as EU8, utilizing an air atomization spray application system, coating a maximum of 60 rigid projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S4;**
- (4) **One (1) paint spray booth, identified as EU10, utilizing an air atomization spray application system, coating a maximum of 10 flexible projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S5; and**
- (5) **One (1) paint spray booth, identified as EU12, utilizing an air atomization spray application system, coating a maximum of 6 wood cases per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S6.**

Section A.3 has been updated to include the two (2) natural gas fired air rotation units.

**A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]**

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This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) two (2) natural gas fired make-up units, identified as EU1 and EU3, each rated at 1.0 and 0.8 million (MM) British thermal units (Btu) per hour, respectively; ~~and~~
- (2) forty one (41) natural gas fired space heaters, with a combined heat input capacity of 0.2 MMBtu per hour-; ~~and~~
- (3) **Two (2) natural gas fired air rotation units, identified as 91 and 92, each rated at 3.125 million (MM) British thermal units (Btu) per hour.**

The facility description box has been updated to include language that states the unit descriptions are not enforceable conditions.

**Facility Description [326 IAC 2-8-4(10)]:**

- (1) one (1) paint spray booth, identified as EU2, utilizing an air atomization spray application system, coating a maximum of 6 wood cases, 3 metal light bloc frames, or 60 plastic projection screens per hour, using dry filters for particulate matter overspray control, and exhausting at one (1) stack, identified as S1; and
- (2) one (1) paint spray booth, identified as EU4, utilizing an air atomization spray application system, coating a maximum of 60 plastic projection screens per hour, using dry filters for particulate matter overspray control, and exhausting at one (1) stack, identified as S2.

**(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)**

The VOC limit in Section D.1.1 has been updated.

**D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]**

The usage of VOC delivered to the applicators, including clean up solvents, in the two (2) paint spray booths (EU2 and EU4) shall be limited to ~~24.0~~ **less than 25** tons per ~~365-day~~ **12 consecutive month** period, **rolled on a monthly basis**. Therefore, the Best Available Control Technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

Condition D.1.2 has been updated to include the three (3) paint spray booths.

**D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)]**

The usage of a single HAP and total HAPs delivered to the applicators, including clean up solvents, in the two (2) paint spray booths (EU2 and EU4) **and the three (3) paint spray booths (EU8, EU10 and EU12) listed in Section D.2**, shall be limited to ~~9.4 and 24.0~~ **less than 10 and 25** tons per ~~365-day period~~, **12 consecutive month period, rolled on a monthly basis**, respectively. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.

Section D.2 has been added to the permit to include the three (3) paint spray booths.

**SECTION D.2 FACILITY CONDITIONS**

**Facility Description [326 IAC 2-8-4(10)]:**

- (a) One (1) paint spray booth, identified as EU8, utilizing an air atomization spray application system, coating a maximum of 60 rigid projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S4;
- (b) One (1) paint spray booth, identified as EU10, utilizing an air atomization spray application system, coating a maximum of 10 flexible projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S5; and
- (c) One (1) paint spray booth, identified as EU12, utilizing an air atomization spray application system, coating a maximum of 6 wood cases per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S6.

**(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

**D.2.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]**



The usage of VOC delivered to the applicators, including clean up solvents, in the three (3) paint spray booths (EU8, EU10 and EU12) shall be limited to less than 25 tons per 12 consecutive month period, rolled on a monthly basis. Therefore, the Best Available Control Technology (BACT) requirements in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

**D.2.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)]**

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The usage of a single HAP and total HAPs delivered to the applicators, including clean up solvents, in the three (3) paint spray booths (EU8, EU10 and EU12) and the two (2) paint spray booths (EU2 and EU4) listed in Section D.1, shall be limited to less than 10 and 25 tons per 12 consecutive month period, rolled on a monthly basis, respectively. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.

**D.2.3 Particulate Matter (PM) [326 IAC 6-3-2]**

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Pursuant to 326 IAC 6-3-2 (Process Operations), particulate matter (PM) from the three (3) paint spray booths (EU8, EU10 and EU12) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

**D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the three (3) paint spray booths and their control device.

**Compliance Determination Requirements**

**D.2.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]**

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The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**D.2.6 Particulate Matter (PM)**

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The dry filters for PM control shall be in operation at all times when the three (3) paint spray booths (EU8, EU10 and EU12) are in operation.

**D.2.7 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks

(S4, S5, S6) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.2.8 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.2.4, D.2.5 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.4 and D.2.5.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.2.11, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.2.9 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.2.4 and D.2.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or

their equivalent, within thirty (30) days after the end of the quarter being reported.

A FESOP Quarterly Report has been added to include the three (3) spray paint booths and the company name change which was listed on the application.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

**Source Name:** Draper, Inc.  
**Source Address:** 411 South Pearl Street, Spiceland, Indiana 47385  
**Mailing Address:** 411 South Pearl Street, Spiceland, Indiana 47385  
**FESOP No.:** FSPR065-11865-00029  
**Facility:** three (3) paint spray booths (EU8, EU10 and EU12)  
**Parameter:** VOC  
**Limit:** The total usage of VOC delivered to the applicators, including clean up solvents, shall be limited to less than 25 tons per 12 consecutive month period.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this month.  
Deviation has been reported on: \_\_\_\_\_

**Submitted by:** \_\_\_\_\_

**Title/Position:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Phone:** \_\_\_\_\_

The FESOP Quarterly Report has been updated to include the three (3) paint spray booths and the company name change which was listed on the application.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT**

## COMPLIANCE DATA SECTION

### FESOP Quarterly Report

Source Name: Draper, ~~Shade and Screen Company Inc.~~  
 Source Address: 411 South Pearl Street, Spiceland, Indiana 47385  
 Mailing Address: 411 South Pearl Street, Spiceland, Indiana 47385  
 FESOP No.: ~~FSPR065-79561~~**11865-00029**  
 Facility: ~~two (2)~~ **five (5)** paint spray booths (EU2, and EU4, **EU8, EU10 and EU12**)  
 Parameter: worst case single HAP usage and total HAP usage  
 Limit: The total combined usage of the worst case single HAP and total HAPs delivered to the applicators, including clean up solvents, shall be limited to ~~9.4 and 24.0~~ **less than 10 and 25 tons per 365 day period, 12 consecutive month period,** respectively.

YEAR: \_\_\_\_\_

Month	Column 1a	Column 1b	Column 1c	Column 2a	Column 2b	Column 2c	Column 1a + 2a	Column 1b + 2b	Column 1c + 2c
	VOC Usage This Month	Single HAP Usage This Month	Total HAP Usage This Month	VOC Usage Previous 11 months	Single HAP Usage Previous 11 months	Total HAP Usage Previous 11 Months	VOC Usage 12 Month Total	Single HAP Usage 12 Month Total	Total HAP Usage 12 Month Total
Month 1									
Month 2									
Month 3									

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this month.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

### Conclusion

The operation of this stationary window shade and projection screen light assembly and surface coating operation shall be subject to the conditions of the attached proposed **Significant Permit Revision for a Federally Enforceable State Operating Permit No.: F065-11865-00029.**

## Appendix A: Emission Calculations

**Company Name:** Draper, Inc.  
**Address City IN Zip:** 411 South Pearl Street, Spiceland, IN 47385  
**CP:** 065-11865  
**Plt ID:** 065-00029  
**Reviewer:** Nishat Hydari / EVP

Uncontrolled Potential Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Natural Gas Combustion	Surface Coating Operation	TOTAL
PM	0.05	10.18	10.23
PM10	0.21	10.18	10.39
SO2	0.02	0.00	0.02
NOx	2.74	0.00	2.74
VOC	0.15	77.81	77.96
CO	2.30	0.00	2.30
total HAPs	0.00	50.77	50.77
worst case single HAP	0.00	20.46	20.46
Total emissions based on rated capacity at 8,760 hours/year.			
Controlled Potential Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Natural Gas Combustion	Surface Coating Operation	TOTAL
PM	0.05	0.06	0.11
PM10	0.21	0.06	0.27
SO2	0.02	0.00	0.02
NOx	2.74	0.00	2.74
VOC	0.15	24.00	24.15
CO	2.30	0.00	2.30
total HAPs	0.00	15.66	15.66
worst case single HAP	0.00	6.31	6.31
Total emissions based on rated capacity at 8,760 hours/year, after control.			

Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations

Company Name: Draper, Inc.  
Address City IN Zip: 411 South Pearl Street, Spiceland, IN 47385  
CP: 065-11865  
Plt ID: 065-00029  
Reviewer: Nishat Hydari / EVP

Material	Process	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Trar Effici
Black Vinyl	EU8	7.41	87.00%	0.0%	87.0%	0.0%	18.50%	0.02000	60.000	6.45	6.45	7.74	185.66	33.88	3.04	34.85	40
Border Paint	EU10	7.90	87.00%	0.0%	87.0%	0.0%	7.70%	0.06300	10.000	6.87	6.87	4.33	103.92	18.97	1.70	89.26	40
Black Lacquer	EU12	7.56	82.10%	0.0%	82.1%	0.0%	12.40%	0.47700	6.000	6.21	6.21	17.76	426.33	77.81	10.18	50.05	40

Potential Emissions	Add worst case coating to all solvents	17.76	426.33	77.81	10.18
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Controlled Potential Emissions:	Material Usage Limitation	Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
		VOC	PM				
	30.84%	0.00%	98.00%	5.48	131.48	24.00	0.06

At a 30.84% annual material usage limitation, VOC emissions are limited to 24 tons per year, therefore, the requirements of 326 IAC 8-1-6 do not apply.  
ings applied in each paint spray booth are mutually exclusive.

THODOLOGY

Is of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
Is of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
tial VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
tial VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
tial VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
ulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
Is VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
= Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations  
HAP Emission Calculations

Company Name: Draper, Inc.  
Address City IN Zip: 411 South Pearl Street, Spiceland, IN 47385  
CP#: 065-11865  
Plt ID: 065-00029  
Permit Reviewer: Nishat Hydari / EVP

ntrolled HAP emissions

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethylbenzene	Weight % Methanol	Weight % Methyl Ethyl Ketone	Weight % Methyl Isobutyl Ketone	Weight % Bis (2-ethylhexyl) phthalate	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Methanol Emissions (ton/yr)	Methyl Ethyl Ketone Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions	(2-ethylhexyl) Phthalate Emissions (ton/yr)
Black Vinyl	7.41	0.02000	60.000	0.00%	33.28%	0.00%	0.00%	5.04%	20.34%	0.00%	0.00	12.96	0.00	0.00	1.96	7.92	0.00
Border Paint	7.90	0.06300	10.000	20.00%	20.00%	5.00%	1.00%	0.00%	0.00%	0.00%	4.36	4.36	1.09	0.22	0.00	0.00	0.00
Black Lacquer	7.56	0.47700	6.000	17.94%	21.59%	0.00%	0.00%	0.00%	0.00%	2.23%	17.00	20.46	0.00	0.00	0.00	0.00	2.11
State Potential Emissions											17.00	20.46	1.09	0.22	1.96	7.92	2.11
Total uncontrolled HAPs																	50.77

THODOLOGY

emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

emissions with material usage limitation

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethylbenzene	Weight % Methanol	Weight % Methyl Ethyl Ketone	Weight % Methyl Isobutyl Ketone	Weight % Diocetyl Pthalate	Material Usage Limitation	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Methanol Emissions (ton/yr)	Methyl Ethyl Ketone Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions	Diocetyl Pthalate Emissions (ton/yr)
Black Vinyl	7.41	0.02000	60.000	0.00%	33.28%	0.00%	0.00%	5.04%	20.34%	0.00%	30.84%	0.00	4.00	0.00	0.00	0.61	2.44	0.00
Border Paint	7.90	0.06300	10.000	20.00%	20.00%	5.00%	1.00%	0.00%	0.00%	0.00%	30.84%	1.34	1.34	0.34	0.07	0.00	0.00	0.00
Black Lacquer	7.56	0.47700	6.000	17.94%	21.59%	0.00%	0.00%	0.00%	0.00%	2.23%	30.84%	5.24	6.31	0.00	0.00	0.00	0.00	0.65
State Potential Emissions												5.24	6.31	0.34	0.07	0.61	2.44	0.65
Total controlled HAPs																		15.66

At a 30.84% material usage limitaiton, single HAP emissions are limited to 6.31 tons per year and total HAP emissions are limited to 15.66 tons per year, therefore, 326 IAC 2-7 is not applicable.

ODOLOGY

emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs \* Material Usage Limitation (%)

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**

**Company Name:** Draper, Inc.  
**Address City IN Zip:** 411 South Pearl Street, Spiceland, IN 47385  
**CP:** 065-11865  
**Plt ID:** 065-00029  
**Reviewer:** Nishat Hydari / EVP

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

6.25

54.8

<b>Facilities</b>	<b>MMBtu/hr</b>
Air Rotation (91)	3.125
Air Rotation (92)	3.125
<b>Total</b>	<b>6.25</b>

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.05	0.21	0.02	2.74	0.15	2.30

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

### Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).